

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
SHAKUNTALA MAHADEO,	:	
“aka Asha,”	:	S1 18 Cr. 316 (PAC)
	:	
Defendant.	:	
-----	x	

WHEREAS, on or about February 10, 2021, a superseding information, S1 18 Cr. 316 (PAC) (the “Information”) was unsealed, charging SHAKUNTALA MAHADEO, “aka Asha,” with conspiracy to distribute and possess with the intent to distribute narcotics, in violation of Title 21, United States Code, Section 846 (Count One); distribution and possession with intent to distribute narcotics, in violation of Title 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2), and Title 18, United States Code, Section 2 (Counts Two through Four); and conspiracy to defraud a health care benefit program, in violation of Title 18, United States Code, Section 1349 (Count Five);

WHEREAS, the Information included a forfeiture allegation as to Counts One through Four of the Information, seeking forfeiture to the United States, pursuant to Title 21, United States Code, Section 853, of any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses charged in Counts One through Four of the Information, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses charged in Counts One through Four of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses charged in Counts One through Four of the Information that the Defendant personally obtained;

WHEREAS, the Information included a forfeiture allegation as to Count Five of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), of any and all property, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense charged in Count Five of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count Five of the Information that the Defendant personally obtained;

WHEREAS, on or about August 21, 2018, the Defendant pled guilty to Counts One through Five of the Information, pursuant to a plea agreement with the Government;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$12,000 in United States currency, representing the amount of proceeds traceable to the offenses charged in Counts One through Five of the Information that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts One through Five of the Information that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys Tara M. La Morte and of Robert B. Sobelman, of counsel, and the Defendant and his counsel, Christopher DiLorenzo, Esq., that:

1. As a result of the offenses charged in Counts One through Five of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$12,000 in

United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offenses charged in Counts One through Five of the Information that the Defendant personally obtained, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant SHAKUNTALA MAHADEO, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to United States Customs and Border Protection, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

4. Upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, and pursuant to Title 21, United States Code, Section 853, United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeiture, shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate

or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.


[THIS SPACE LEFT INTENTIONALLY BLANK]

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:


TARA M. LAMORTE
ROBERT B. SOBELMAN
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-1040 / 2616

11/21/22
DATE

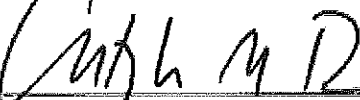
SHAKUNTALA MAHADEO

By:


SHAKUNTALA MAHADEO


11/18/22
DATE

By:


CHRISTOPHER M. DILORENZO, ESQ.
Attorney for Defendant
DiLorenzo & Rush
944 Gerard Avenue
Bronx, NY 10452

11/18/22
DATE

SO ORDERED:


HONORABLE PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

11/21/2022
DATE